

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BRUNO HOFMANN, Individually and on Behalf of)
All Others Similarly Situated,)

Plaintiff,)

v.)

PHILIP LAUGHLIN, MICHAEL SABOLINSKI,)
ALBERT ERANI, DONNA ABELLI LOPOLITO,)
JOHN J. ARCARI, HERBERT M. STEIN,)
ALAN ADES, BERNARD A. MARDEN,)
ALAN W. TUCK, NOVARTIS PHARMA AG and)
PRICEWATERHOUSECOOPERS LLP.)

Defendants)

No. 04-10027-JLT

STIPULATION AND ORDER TO EXTEND
TIME TO RESPOND TO COMPLAINT

Plaintiff and defendant Herbert M. Stein ("defendant"), by their undersigned counsel, hereby stipulate and agree that the time within which he may move, answer, or otherwise respond to the complaint in this action is extended to and including 45 days after the later of: (a) the Court's selection of a lead plaintiff pursuant to § 21D(a)(3) of the Securities Exchange Act of 1934 (15 U.S.C. §§ 78a, et seq.), or (b) the date on which a consolidated amended complaint, if any, is served upon defendant, either pursuant to a Court order issued in connection with the selection of a lead plaintiff or otherwise, or by agreement of the plaintiff in this action and the plaintiff(s) in any other action which is filed in this Court and which asserts claims similar to those alleged in the above-captioned action.

This Stipulation is similar (but for the different defendant) to the Stipulation allowed by the Court on March 15, 2004 with respect to Defendants Alan Ades and Albert Erani.

The plaintiff and defendant respectfully request that the Court approve their Stipulation.

Respectfully Submitted,

Plaintiff,

By his Attorney

Nancy F. Gans pro bono to 4/6/04
attorneys
Nancy Freeman Gans (BBO# 184540)
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Respectfully Submitted,

HERBERT M. STEIN

By his Attorneys

Peter M. Saparoff
Peter M. Saparoff (BBO#441740)
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and Popeo, P.C.
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April 6, 2004

I hereby certify that a true copy of
the above document was served
upon the attorney of record for each
party by mail/hand 4/6/04.

PMS

SO ORDERED:

Dated: _____

Joseph L. Tauro
United States District Judge